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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

UNITED STATES OF AMERICA

1:18-cr-00464-001-AA

v.

**GOVERNMENT'S SENTENCING
MEMORANDUM**

WILLIAM GREGORY DOUGLAS,

Defendant.

Introduction

William Douglas made a series of threats to shoot YouTube employees including one specific threat to the company's CEO. He was upset that YouTube shut down his channel. These threats were made over approximately one month and became increasingly hostile, violent and specific.

To address the seriousness of this offense and deter any similar misconduct in the future, Douglas should receive a 12-month sentence, the low end of the applicable guideline range followed by 3 years of supervised release.

Factual Background

A. The Offense Conduct

On August 27, 2018 Google security contacted the FBI because one of its users with the moniker LiamXmaiLRevolutionX was posting threatening tweets. The tweets indicated that the user was angry because his YouTube channel was canceled by the company. The user posted the following tweets:

August 22, 2018: @TeamYouTube you took my channel @TrustedFlagger will not help please fix.

August 23, 2018: Return my channel you low life as Sholes before someone else comes and shoots more of your employees you fucks

August 23, 2018: You Guy Are fucking Criminals As FuCK FuCK FuCK You @YOUTUBE you want a bigger mass casualty aka shooting let's see what I can do

August 23, 2018: FuCK you @youtube im few hours away and if you are just going to ignore me try ignoring my gun you fucks

August 23, 2018: @TrustedFlagger @TeamYouTube @youtube no more warning expect massive casualties

August 23, 2018: "I would kill the 100 YouTube employees if given the chance @TeamYouTube

September 8, 2018: Hey why do you guys keep ignoring me would it be better if I leave you with no other options like your leaving me what your doing us ridiculous I'm beyond pissed at you @youtube so I wonder how I should deal with this frustration?

September 17, 2018: @susanwojcicki Susan I'm coming for you today #pray

The FBI determined that twitter moniker LiamXmailRevolutionX belonged to Douglas by watching a series of videos he posted. On one video, Douglas says he is going to Mountain View (one of YouTube's campuses) to visit the people at YouTube.

When agents contacted Douglas, he claimed that the YouTube moniker was an old one he had established about seven years ago. Douglas claimed that he could not remember the last time he posted anything to YouTube and suggested his account was hacked. He denied posting the threatening tweets.

The Charges

Douglas pled guilty to one count of interstate communications with intent to extort.

Guideline Computations

The government agrees with the following PSR computations:

Enhancement	Government's Position
Base— USSG § 2A6.1	12
Specific Offense Characteristics— U.S.S.G. § 2A6.1(b)(2)(A) (more than one threat)	+2
Acceptance of Responsibility	-2
Government's Total Offense Level	12
Resulting Guideline Range	12-18 months

Argument

A. Contested Guideline Issues

The government is not aware of any contested guideline issues.

B. Government's Recommended Sentence

Douglas has already served his 12-month sentence pre-plea, and he has been doing well on community supervision since his release on February 20, 2020. A 12-month sentence with credit for time served is appropriate here, with 3 years' supervised release.

On behalf of the victims, the government also concurs with probation's recommended special conditions number 2 and 3, no contact with YouTube employees or campus/facilities. The victims did not submit a victim impact statement for court consideration but strongly requested no contact with the named victim or any YouTube campus.

Conclusion

Based on the foregoing, the government recommends that this Court impose a 12-month sentence, followed by a 3-year term of supervised release subject to the standard and special conditions recommend by the PSR writer; and a \$100 fee.

Dated: August 31, 2020.

Respectfully submitted,

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United States Attorney

/s/ Judith R. Harper

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